

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

TODD C. BANK, Individually and on  
Behalf of All Others Similarly Situated,

*Plaintiff,*

-against-

ICOT HOLDINGS, LLC, and  
ICOT HEARING SYSTEMS, LLC,

*Defendants.*

1:18-cv-02554-AMD-PK

**DECLARATION OF TODD C. BANK**

1. I am the plaintiff in the above-captioned matter, and submit this declaration in support of my motion for class certification and for the appointment of Daniel A. Osborn as class counsel.

2. I incorporate, by reference, all factual assertions in my accompanying memorandum of law.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct.

*s/ Todd C Bank*  
Todd C. Bank  
Executed on March 12, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing document is being filed electronically on March 12, 2021, via the Court's electronic-case-filing (ECF) system. Notice of this filing will be sent by the Court's ECF system to all parties, and copies will be mailed to those parties, if any, that are not served in such manner.

Dated: March 12, 2021

**s/ Todd C. Bank**  
Todd C. Bank